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Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
Administration of the)
North American Numbering Plan)

GTE COMMENTS

GTE Service Corporation, on behalf of its
domestic affiliated telephone operating
companies and GTE Mobile
Communications

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SUMMARY

The National Association of Regulatory Utility Commissioners proposes many issues for consideration in an FCC Inquiry. GTE believes many of the issues raised in the Petition are already being addressed or have been resolved. However, some of the issues could prove to be fertile ground for an FCC Inquiry. Since even small changes to the North American Numbering Plan can have large impacts, it is important that the FCC be cautious in addressing these issues.

It is also important that the FCC's Inquiry not send the wrong signals to industry participants who are preparing to implement many of the agreed-upon resolutions. Delay in implementing some changes may mean that customers will not be able to call one another. The issues which GTE believes could be addressed in the Inquiry include: Issue #5, Bellcore as the Administrator; Issue #6, an equitable plan for assignment of codes; Issue #7, methods to reduce demand or augment the supply of numbers; and Issue #2, recovery of costs.

GTE believes a properly focused proceeding concerning the fairness of the overall administration of the North American Numbering Plan will be the most productive use of the Commission's and the industry's time and resources.

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GTE Service Corporation, on behalf of its affiliated domestic telephone operating companies and GTE Mobile Communications ("GTE"), hereby files its comments pursuant to the Commission's Public Notice, DA 91-1307, released October 18, 1991. The Public Notice established comment and reply dates for the Petition for Notice of Inquiry ("NOI") filed by the National Association of Regulatory Utility Commissioners ("NARUC") on September 26, 1991 ("Petition"). The NARUC Petition requests that the Commission begin an Inquiry into various aspects of the North American Numbering Plan ("NANP") and its administration. While GTE supports an Inquiry to address some of the issues raised, many areas discussed by NARUC are already being addressed or have been resolved by consensus activities of the industry and do not require any further regulatory response. Still other areas are already being pursued by the FCC and would not need to be part of any Inquiry launched by the Commission in response to the Petition.

Introduction

Before discussing the merits of the issues raised in the Petition, it is important to understand the significance of numbers and numbering plans to the telecommunications industry. Numbers are the basic building blocks of our North American telecommunications

network infrastructure (often called the Public Switched Telephone Network or the PSTN). From the telecommunications user's side, every subscriber is familiar with the existing 10-digit numbering plan. The public is at ease with the number format and the meaning of the different "fields" in a telephone number. For example, most people can identify the Area Code portion of a regular number and relate that to a geographic location of the called party (i.e., 312 is a number in Chicago). The Area Code is also called the Number Planning Area ("NPA") Code. On the telecommunications provider's side, almost all the routing and rating functions related to telephone calls are presently tied to the originator's phone number and the number being called. From an equipment provider's perspective, all telephone switching equipment is designed based on these numbers, and most telecommunications customer accounts and some calling cards have the customer's telephone number embedded in the account number. Thus, any actions affecting numbering have implications for every party involved.

Since its inception in the late 1940s, the existing 10-digit format of the NANP has served the public well. With the increase of over 5 billion numbers that interchangeable codes will inject in 1995, it is anticipated that this format can continue to be used well beyond the year 2020. Interchangeable codes -- including the use of central office code format numbers for NPAs -- represent a simple but elegant solution to creating more numbers, while still maintaining the existing format and numbering plan. Therefore, for geographically-assigned codes, subscribers will still be able to identify where they are calling without any change to the numbering format. The introduction of interchangeable codes is the most substantial change to the NANP since its inception and it has required significant planning by and cooperation among carriers and others in the telecommunications industry. Failure to implement the agreed-upon solution in a timely manner by all industry parties can mean some customers will not be able to dial other customers. For interchangeable NPA codes to be used, every switch in the country must be capable of handling them before the first one is used. Thus, a nationwide cut-over is involved.

Small changes in the numbering plan can magnify to large costs for everyone in both convenience and dollars. Thus, all proposals for change must be approached in a very cautious and knowledgeable manner. Often, well-intentioned but not thoroughly thought-out changes are proposed which end up being discarded after full consideration by industry standards-setting bodies. The standards bodies arrive at optimum solutions to complex problems. GTE urges the FCC to carefully weigh these factors in its consideration of the list of NARUC issues involving numbering.

DISCUSSION

It is not clear that a broad investigation of the NANP is necessary; such a broad inquiry may impede progress already accomplished by the NANP Administrator.

NARUC at page 4 of its Petition claims that an Inquiry is needed because the communications industry must "spend untold millions of dollars to devise and eventually implement the chosen solutions." NARUC goes on to suggest that the cost to implement changes in the NANP and potential ensuing customer confusion justifies a full-scale FCC Inquiry. NARUC lists 10 specific issues at pp. 5-7 that require the "regulators' interest and attention." These include:

1. The costs to the telephone companies and the ratepayers of creating and deploying a system of interchangeable NPA codes or any alternative plan to address the NPA code exhaust;
2. The costs that may be appropriately allocated to a telecommunications service that consumes a limited resource, such as a telephone number or [Carrier Identification Code ("CIC")], that will eventually cost many millions of dollars to replenish;
3. The effects a new numbering scheme may have upon the differing types of existing customer premises equipment and the dialing patterns familiar to ratepayers;
4. The potential strategies for the deployment of telephone numbers and other NANP codes required to implement new services including [Personal Communications Services ("PCS")];
5. The possible competitive advantage to the Regional Bell Operating Companies of having Bellcore as the NANP Administrator;

6. The examination of equitable plans for assigning NANP codes among the competing interests such as the Bell Operating Companies, the Independent Operating Companies, the Interexchange Carriers, the Enhanced Service Providers, Cellular Mobile Carriers, and emerging PCS providers;
7. The examination of methods that may be used to reduce the demand for scarce NANP codes, or to augment the existing supply of telephone numbers, such as central office code-sharing and reclaiming unused telephone numbers, or some combination of the above;
8. The establishment of additional monitoring reports that could be used by regulators to exercise oversight, decide public policy, and inform the public;
9. The examination of technically feasible alternatives, available today or in the future to the plan developed in the 1960's for exhaust of the current NPA coding scheme; and
10. The examination of any final proposal to assure that it includes an appropriate consideration of the independent telephone companies' switching equipment and reconfiguration costs.

GTE believes that more than half of these "issues" do not require further Inquiry. The telecommunications industry has already put in considerable effort on several NANP issues, most notably interchangeable NPA codes and CIC expansion. The adoption and implementation of interchangeable codes, in particular, should serve the needs of industry for at least the next 30 years.¹ Interchangeable codes will increase the availability of telephone numbers by more than 5 billion. The industry has already invested a great amount of time and resources into this issue, investigated other alternatives, and reached a consensus. GTE believes that the interchangeable code solution is the optimum solution. In addition, the various state Public Utility Commissions ("PUCs") still retain their general authority over dialing plans and overall expense outlays to implement changes in the NANP that benefit all telecommunications users in their jurisdiction.

With respect to issue 3, which covers dialing plans and Customer Premises Equipment ("CPE"), there is already in place widescale notification efforts to ensure that CPE vendors are

¹ See, e.g., Presentation of NANP Administrator Fred Gaechter before the Industry Carrier Compatibility Forum ("ICCF") #21, November 29, 1990.

aware of changes that affect such equipment. For example, introduction of a new NPA format code as an office code, can require reprogramming of a PBX that was programmed on the assumption that all numbers would be of the NPA-NXX format. This has been discussed at FCC/Industry meetings on the Part 68 Registration Program and numbering notifications are provided to trade associations representing PBX vendors. Equipment manufacturers are aware of changes due to their involvement in standards activities and other industry fora. Dialing plan changes are also widely disseminated in the geographic service areas affected. Current FCC Rules, Section 68.110(b), already require that changes affecting CPE be communicated to customers so that CPE can be updated to maintain compatibility. Further, the 1+ method of dialing toll points is being maintained in most jurisdictions so that customers with older key systems and PBX systems who desire to block toll from certain telephones can still block 1+ traffic. Consequently, GTE submits that issue #1 (costs to telephone companies and ratepayers for deployment of interchangeable NPA codes) and issue #3 (effects of a new numbering scheme on CPE and dialing plans) should not be a part of any FCC NOI issued in response to the NARUC Petition, since these areas have already been addressed or are "business as usual" today.

Similarly, GTE suggests that issue #9 (examine technically feasible alternatives for exhaust of the current NPA coding scheme) would not be a fruitful area of Inquiry, since the telecommunications industry has already worked diligently on developing the interchangeable NPA system. This process included consideration of other alternatives. The agreed-upon solution is the optimal solution and work and resources now need to be directed to implementation.

Since the existing procedures for developing this system have worked well, GTE is concerned that opening up this issue again, at this late date, could serve to confuse the industry and frustrate the advances the industry has made in planning for the expansion of numbering resources. By sending the wrong signals, some industry participants may delay implementation

activities and, thus, not be ready for the cut-over. Further examination of this issue would not be in the public interest, if it delays activities necessary for the cut-over.

GTE also submits that issue #4 (strategies for deployment of telephone numbers and other NANP codes for new services) is another area already adequately being considered as part of the existing processes. For example, PCS numbering is being addressed in the U.S. State Department Study Group A Ad Hoc Committee On Numbering Plans for Universal Personal Telecommunications ("UPT") and other standards committees dealing with this issue, e.g., Exchange Carrier Standards Association T1P1. Because this issue is being considered by a world standards-making body, GTE believes that unless the work of the CCITT Committee shows evidence of results detrimental to U.S. interests, it would be appropriate for the FCC and other domestic regulatory bodies to limit their activity to a monitoring role. The FCC is represented in the State Department activities, and, thus, can monitor the progress being achieved. Since PCS -- which in CCITT terminology is included under UPT -- can be a world-wide service, it is important that international considerations as well as regulatory policies such as number portability be factored in as part of a strategy for UPT numbering.

There are two further issues that NARUC raises that do not appear to require a federal Inquiry. Issue #8 (the establishment of additional monitoring reports) may not be a necessary activity. Today, there are numerous reports that are distributed within the industry and to the FCC Industry Analysis Division with respect to numbering resources. There is no indication that such reporting is inadequate. If there is a need for further information or monitoring reports, parties should request such information from the NANP Administrator ("NANPA") or from the industry. This may be a case where education about what is already available is all that is necessary.

Issue #10 (examination of any final proposal to include consideration of independent telephone company switching equipment and reconfiguration costs) assumes that there is some "final" proposal that will have some large impact on telephone company investment and customers. GTE suggests that any changes in the numbering plan are of an evolutionary nature and that state regulatory bodies are kept advised of cost impacts through their regular oversight of telephone company investment decisions. With respect to knowledge about impacts on independent telephone switching equipment, the industry -- including independents -- is kept fully informed via intra-industry communications such as the United States Telephone Association ("USTA") Technical Bulletins. USTA has a very active Numbering Planning Subcommittee.

In summary, GTE sees no need for an FCC Inquiry on the above issues. In fact, an FCC Inquiry could have an adverse effect since it might reverse or stall much of the progress that has already been made, especially with respect to interchangeable NPA codes. The other matters raised are already addressed by current FCC Rules, or current processes.

Some of the issues that NARUC discusses are worthy of further study; however, such an Inquiry should be narrowly drawn and should not allow potential stakeholders to gain a competitive advantage or stall the process.

In reviewing NARUC's list of issues, GTE submits that issues #5 (Bellcore as NANPA), #6 (equitable plan for assignment of NANP codes), and #7 (methods to reduce demand for scarce codes or augment supply of telephone numbers) may be fertile ground for an FCC Inquiry. This could be helpful in coming to a clearer understanding of how the NANP works today and how it should work in the future as new technologies and new services put further stress on the limited resources of telephone numbers and various codes used in conjunction with telecommunications services.

Although GTE does not want to prejudge the outcome of such an Inquiry, it believes that a well-documented and equitable process for assigning numbering resources is more critical than who administers the process. GTE has previously expressed its commitment to fair assignment of codes. In its Comments and Reply Comments in CC Docket 86-10,² GTE requested the FCC to oversee the assignment and administration of 800 numbers to ensure an unbiased administration, fairness, and lack of abuse of process. However, GTE did not suggest a change of the Administrator, just a monitoring program to ensure lack of abuse.³

In support of the FCC's recent query to the NANPA about central office code assignment guidelines, GTE business units have recently sent letters to the NANPA enclosing GTE's telephone companies' guidelines for Central Office numbering assignments and setting forth the impacts of numbering issues on cellular providers. GTE has no objection if the NOI results in a public discussion of issues surrounding who administers the NANP as well as the fairness of how numbers are distributed. In fact, a federal proceeding may serve to quell any apprehension some parties may have about the fairness of the current process and such distribution of numbers.

Although GTE and the rest of the industry have experienced some frustration with conserving some numbering resources, GTE believes that a public Inquiry may help surface legitimate issues regarding conservation or augmentation of numbering resources that would be

² See GTE Comments filed March 4, 1986, pp. 15-16, and Reply Comments filed April 1, 1986, p. 8.

³ With respect to NANP issues, the FCC has asserted plenary jurisdiction over the allocation of NXX codes. The FCC stated that: "The very purpose of the North American Numbering Plan (NANP) which has established the codes as a national resource of the United States and Canada, is to ensure the equitable distribution of the codes nationwide without duplicating codes and numbers. Furthermore, any state regulation of this national resource could substantially affect interstate communications by disrupting the uniformity of the NANP." 2 FCC Rcd 2910, at 2912. ("Cellular Interconnection Order II")

in the public interest. Reclamation of CIC numbers may be such an issue.⁴ GTE fully supports efforts to conserve numbers; however, some forms of number sharing cannot currently be accommodated technically. While NXX sharing between a cellular carrier and non-cellular users is not a problem, sharing of NXX codes by competing cellular carriers in the same NPA presents technical problems in certain "roaming" situations.

While GTE supports a limited Inquiry, the Commission should not permit any party to use such an Inquiry to re-hash issues previously fairly- and fully-decided by consensus in the industry processes. While consensus decisionmaking produces optimum compromises, they may not be unanimous decisions. Vocal parties with minority views may try to use Commission processes to gain a competitive advantage. The Commission needs to recognize that most aspects of the NANP have operated smoothly, efficiently, and fairly. The lack of any significant complaints before the FCC is testimony to the current equitable administration of numbering resources. A public and governmental Inquiry should not lose sight of previous work accomplished by entities involved with the NANP.

GTE submits that looking at the issue of who the Administrator is and the fairness of the process should be the focal points of any FCC Inquiry.⁵ Anything that goes much beyond this basic approach runs the risk of undermining a lot of useful work that has gone into the creation, development, and continued successful operation of the North American Numbering Plan. As stated previously, the more critical issue is the equity of the process itself, not necessarily the

⁴ The FCC already is investigating some of the issues related to CIC codes. See, Richard M. Firestone, Chief, Common Carrier Bureau, letter dated October 4, 1991 to local exchange carrier counsel and GTE's October 31, 1991 reply.

⁵ Although the FCC has asserted plenary jurisdiction over the domestic aspects of the NANP, the fact is that Bellcore also administers the NANP for other countries. The FCC would not appear to have any jurisdiction over these aspects of Bellcore's activities as NANPA, since such oversight would fall properly to other governments.

process administrator. However, since the possibility of abuse always exists, an oversight mechanism is required. Currently, complaints to the FCC are the oversight mechanism.

Recovery of costs for number administration is also an area that would need to be included. This issue is raised in NARUC's list as Issue #2. Although the Cellular Interconnection Order II allows a reasonable charge to compensate the telephone company for the costs of assigning new numbers, cellular companies are also entitled as co-carriers to reasonable accommodation of their numbering requirements on the same basis as an independent wireline telephone company. (4 FCC Rcd 2910) The intrastate component of such costs falls within the states' purview. (Id. at 2912) Any proposals to change the process of administration need to also focus on cost recovery for such administration, including reciprocal costs. For example, a local exchange carrier may have costs of administering NXX codes, but cellular carriers also have costs administering NXX number changes in their switches to accommodate number changes initiated by others.

CONCLUSION

GTE submits that NARUC's Petition should only be granted in part. It will not serve the public interest to engage in the full-scale, wide-open Inquiry that NARUC has proposed and many of the other issues are already resolved. On the contrary, a narrowly-focused proceeding concerning the fairness of the overall administration of the NANP will be the most productive use of the Commission's and the industry's time and resources.

Respectfully submitted,

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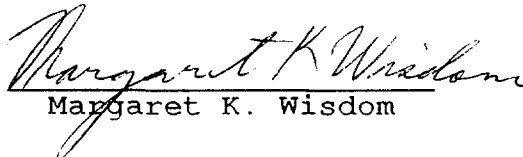
CERTIFICATE OF SERVICE

I, Margaret K. Wisdom, hereby certify that copies of the foregoing "GTE Comments" have been mailed by first class United States mail, postage prepaid on the 20th day of December, 1991, to the following parties.

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